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June 11, 2020

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
500 Pearl Street  
United States Courthouse, Southern District of New York  
New York, NY 10007

Re: Meikle v. Transaction Network Services, Inc.  
Case No. 1:20-cv-00953 (JGK)

Dear Judge Koeltl:

We represent Defendant in the above-referenced matter. Pursuant to Your Honor's Individual Practices, we write to respectfully request a two-week extension of time from June 12, 2020 up to and including June 26, 2020 for the parties' disclosures under the Pilot Discovery Protocols for Counseled Employment Cases ("Discovery Protocols"). The disruption to business operations caused by the COVID-19 pandemic has made it more difficult to obtain the documents Defendant is required to produce under the Discovery Protocols

Defendant makes this request with the consent of Plaintiff, and this is Defendant's first request for an extension of this deadline. We not believe an extension should affect any other scheduled dates in this matter.

We thank the Court for its courtesy and attention to this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

/s Adam S. Gross

Adam S. Gross

cc: Counsel of Record (via ECF)  
4826-0486-8031, v. 1